



750 Third Avenue
New York, NY 10017-2703
(212) 687-8181
Fax: (212) 972-9432
www.kreindler.com

February 25, 2015

VIA ECF/CM

Judge Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Reyes, et al. (Jeffrey Dukes)*, 14 Cr. 483 (LAP)

Dear Judge Preska:

I am defense counsel to Jeffrey Dukes, who is charged in the above referenced multi-defendant prosecution and am writing request a brief extension of the time by which defense motions must be filed, which currently is March 2, 2015, for one week, until March 9, 2015. This is the first such request and the assistant United States Attorney on this matter has advised me that he consents to the request.

This request is being made in order to allow the defense additional time to engage in conversations with the government without foreclosing possible resolutions of the case for Mr. Dukes. Mr. Dukes recently became a first-time parent when his partner gave birth to a healthy baby girl earlier this month, which has somewhat hampered our ability to schedule necessary meetings. With schedules resuming some semblance of normalcy, I expect to be able to proceed expeditiously from this point forward.

For these reasons, I respectfully request that the Court grant my application extend the date by which any defense motions by Jeffrey Dukes must be filed until March 9, 2015. I have spoken with the assistant United States Attorney with respect to this request and he has advised me that he consents to my application.

Respectfully,

/s/ Megan W. Benett
Megan W. Benett, Esq.

cc: assistant United States Attorney Brendan Quigley via ECF/CM

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California Office

707 Wilshire Boulevard, Los Angeles, CA 90017-3613
Tel: (213) 622-6469 Fax: (213) 622-6019

Massachusetts Office

855 Boylston Street, Boston, MA 02116-2688
Tel: (617) 424-9100 Fax: (617) 424-9120